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*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC and  
Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

LUCERNE FOUNDATION and DOUGLAS J.  
RIMSKY in his capacity as Trustee,

Defendants.

Adv. Pro. No. 10-05055 (SMB)

**SECOND AMENDED CASE MANAGEMENT NOTICE**

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

1. The Initial Disclosures were completed: April 30, 2014
2. Fact Discovery shall be completed by: June 1, 2015
3. The Deadline for Service of Substantive Interrogatories was: November 13, 2014
4. The Disclosure of Case-in-Chief Experts shall be due: August 3, 2015
5. The Disclosure of Rebuttal Experts shall be due: September 2, 2015
6. The Deadline for Completion of Expert Discovery shall be: November 30, 2015
7. Deadline for Service of a Notice of Mediation Referral shall be: January 29, 2016
8. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: February 12, 2016
9. The Deadline for Conclusion of Mediation shall be: June 13, 2016

Dated: New York, New York  
April 1, 2015

BAKER & HOSTETLER LLP

By: /s/ Marc E. Hirschfield

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